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8 *Attorneys for the United States*

9
10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 JORGE MADRIGAL-GUZMAN,
16 Defendant.

Case No.: 2:20-cr-00239-JAD-EJY

**STIPULATION TO CONTINUE
SENTENCE HEARING DATE**

(First Request)

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18 IT IS HEREBY STIPULATED AND AGREED by and between Christopher
19 Chiou, Acting United States Attorney, and Kimberly M. Frayn and Bianca R. Pucci,
20 Assistant United States Attorneys, counsel for the United States of America, and
21 Monique N. Kirtley, counsel for Jorge Madrigal-Guzman, that the sentencing hearing
22 date currently scheduled for May 10, 2021 at 1:30 p.m. be vacated and set to a date and
23 time convenient to this Court, but no sooner than thirty (30) days.

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25 The Stipulation is entered into for the following reasons:
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1 1. The defendant is in custody and does not object to the continuance.

2 2. The parties agree to the continuance.

3 3. Government counsel, AUSA Pucci, is set to begin a jury trial on May 3,
4 2021, which is anticipated to continue through at least May 11, 2021. As such,
5 government counsel will not be able to appear for the currently scheduled sentencing
6 hearing as scheduled.

7 4. The requested time is not for purposes of delay. The parties need additional
8 time to prepare for the sentencing hearing, including time to prepare and file appropriate
9 sentencing memoranda.

10 5. Additionally, denial of the continuance could result in a miscarriage of
11 justice and the ends of justice served by granting this request, outweigh the best interest of
12 the public and the defendant in a speedy hearing. The additional time requested by this
13 stipulation is made in good faith and not for purposes of delay as contemplated by Rule
14 32 of Federal Rules of Criminal Procedure.

15 6. This is the first stipulation to continue the sentencing hearing date.

16 DATED: April 27, 2021

17 CHRISTOPHER CHIOU
18 Acting United States Attorney

19
20 By /s/Monique Kirtley
21 MONIQUE KIRTLEY
22 Assitant Federal Public Defender
23 Counsel for Defendant

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25 By /s/Kimberly M. Frayn
26 KIMBERLY M. FRAYN
 BIANCA R. PUCCI
 Assistant United States Attorneys

UNITED STATES OF AMERICA,
Plaintiff,
v.
JORGE MADRIGAL-GUZMAN,
Defendant.


1 stipulation is made in good faith and not for purposes of delay as contemplated by Rule
2 32 of Federal Rules of Criminal Procedure.

3 6. This is the first stipulation to continue the sentencing hearing date.

4 **ORDER**

5 THEREFORE, IT IS HEREBY ORDERED that the sentencing hearing in the
6 above-captioned matters, currently scheduled for May 10, 2021 at 1:30 p.m., be vacated
7 and continued to June 28, 2021, at 10:00 a.m.

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11 DATED this 28th day of April, 2021.

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15 HONORABLE JENNIFER A. DORSEY
16 United States District Court Judge
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